

## **STATEMENT OF STATUS AND SUPPORT.**

### **STATUS OF THE CLAIMS:**

Claims 1-19 were issued in the '231 patent. The claims 1-19 are cancelled without prejudice. Claims 41-82 and 86 are cancelled without prejudice by this amendment. New dependent claim 89-91 are added by this amendment. Claims 32-34 are amended by this amendment.

Accordingly, claims 32-40, 83, and new claims 89-91 are currently pending in the application.

### **SUPPORT OF CLAIM CHANGES:**

Applicants have made amendments to claims 32-34, and 83 and added new claims 89-91. The amendment changes and the support for these amendments is shown below coupled with the claim mapping to the claims in the patent, as requested by the examiner.

## **REMARKS**

Note that the "second banking institution" recitation in the claims has been changed to the "*licensed banking institution*," to more closely track the language in the specification. Additionally, the "first banking institution" recitation has been changed in the claims to the "*different bank*."

Note that the order of claim elements recited in the claims are exemplary only, and not limiting on the claims.

Note that the term "*transaction data comprising*" is open-ended and includes transactions by check, electronic funds transfer, debit card, ACH debit and credit, and credits or debits comprising nets or summary information or sweeps of multiple transactions, as described in applications' specification at column 3, lines 26-37 and 43-63, column 4, lines

44-48, and consistent with the Remarks of the April 12, 2000 response in the prosecution of the original '231 patent.

**SECTION 112 REJECTION, 2<sup>ND</sup> PARAGRAPH:      Claims 32-50, 60-68, 83 and 86 were rejected under 35 USC 112, second paragraph, for indefiniteness. This rejected is obviated in view of the following amendments and remarks. Reconsideration and withdrawal of the rejection is respectfully solicited.**

Each point raised by the examiner will be discussed below. Note that the Office Action reference to cancelled claim 31 is assumed to be a reference to claim 32.

In paragraph 1 of page 3 of the Office Action, a query is made on how the aggregating operation is impacted by the limitation that there be more than 6 withdrawals from at least one of the client transaction accounts in a month.

Response: The netting operation (*“determining, by the one or more computers, a net transaction aggregated across all of said transaction data associated with at least the second plurality of the transaction accounts for the period of time, where more than six (6) of the net transactions determined over the month period are negative;”*), per the claim language, is performed more than 6 times over a month period, per the underlined claim language. But the scope of the claim is limited to only cover the method when in at least one month period the processing is performed for at least one of the transaction accounts that has more than 6 withdrawals and/or transfers in the month, per the underlined claim language (*“processing, by one or more computers, client account transaction data comprised from a second plurality of the transaction accounts, the client account transaction data for a respective transaction account comprising data associated with one or more deposits and/or transfers to and/or one or more withdrawals and/or transfers from the respective transaction account during a period of time, wherein during a month period client account transaction data for at least one respective transaction account comprises at least more than six (6) withdrawals and/or transfers by check and/or debit card and/or ACH debit and/or sweep from said respective transaction account;”*). For example, a process would be covered where the system during at least one month period processes a withdrawal on behalf of client A from the respective client

transaction account for client A in each of the periods of time, e.g., days, 1, 5, 8, 9, 10, 11, and 15 in a month period. This situation brings into play the inventive features of the claimed invention. Note that these respective processed withdrawals and/or transfers by or on behalf of the client A are netted in with the deposits and/or transfers and withdrawals and/or transfers of other clients when the net transactions are determined for the respective period of time, e.g., the respective day, per that claim limitation.

In paragraph 2 of page 3 the Office Action, it is noted that the specific information which causes the withdrawals more than 6 times from the single MMDA is not recited in the claim.

Response: A clarification to the claim language has been made in the *determining a net transaction* step (“*where more than six (6) of the net transactions determined over the month period are negative;*”) and the *determining a net credit/debit amount* step (“*so that during the month period there are more than six (6) net credit/debit amounts that are negative and correspond to withdrawals and/or transfers from the single insured money market deposit account;*”) to obviate this concern.

In paragraph 3 of page 3 of the Office Action, it is stated that information about the net transaction is sent only once.

Response: This limitation has been rewritten as “*determining, by the one or more computers, a net credit/debit amount based on at least in part the respective net transaction associated with the respective period of time which corresponds to an amount of funds to deposit and/or transfer to or withdraw and/or transfers from the single insured money market deposit account at the licensed banking institution through a different bank, so that during the month period there are more than six (6) net credit/debit amounts that are negative and correspond to withdrawals and/or transfers from the single insured money market deposit account.*” Additionally, the previously recited “*determining*” step has been rewritten as (“*determining, by the one or more computers, a net transaction aggregated across all of said transaction data associated with at least the second plurality of the transaction accounts for the period of time, where more than six (6) of the net transactions determined over the month period are negative;*”). This language clarifies that there are more than 6 withdrawals and/or

transfers from the single insured money market deposit account over the month period, and these at least 6 withdrawals and/or transfers are caused by at least 6 negative “*net transactions*” in a month period, thereby obviating this concern.

In paragraph 4 of page 3 of the Office Action, a query is made on the location of the computers that operate for the “*obtaining data*” step.

Response: The physical location for the one or more computers used is not restricted.

In paragraph 1 of page 4 of the Office Action, it is stated that “*the respective amounts determined*” language, that is found in the “*distributing by crediting*” step, does not have antecedent basis.

Response: The antecedent basis for this element may be found in the preceding step (“*obtaining data, at the one or more computers, for each of a respective third plurality of the transaction accounts, for a respective amount of interest to be credited to the respective transaction account from the interest earned in the single insured money market deposit account at the licensed banking institution;*”). However, to further clarify this, the “*distributing by crediting*” step has been amended to add the word “*respective.*” Note that the basis for the “*distributing*” interest step in applicants’ patent application specification may be found at least at column 5, lines 16-24. Note that the “*distributing*” operation may comprise posting the interest to the database. See column 5, lines 31-36.

In paragraph 2 of page 4 of the Office Action, a query is made whether the updating the database step requires an updating based on the interest distributed.

Response: Note that the “*distributing*” interest step is performed by updating the database, per column 5, lines 16-24 and 31-36. Thus, it would be redundant to reference interest again in the updating step.

In paragraph 4 of page 4 of the Office Action, there is a reference to the one or more computers being located at the second banking institution (now referred to as the “*licensed banking institution*”).

Response: This is not correct. The physical location of the one or more computers is not limiting on the claims. The management of the “*single insured money market deposit account*” may be performed by the administrator computers which are not limited in their location. See Figs. 1 and 2 and columns 3 and 4 of the specification, and particularly column 3, lines 10-11.

**The examiner requested a claim mapping of elements of the new claims to the original patent claims and an explanation of support for differences. The mapping and explanation follow.**

**CLAIM MAPPING AND STATEMENT OF SUPPORT:**

Applicants have made amendments to claims 32-34 and 83, and new claims 89-91 have been added.

The amendments to independent claim 32 are shown with only the current additions underlined and strike-out for deletions relative to the last amendment to illustrate the changes relative to that last amendment. The basis in the specification for the claim limitations is set forth.

32. (New) A method for managing a ~~plurality of plural~~ transaction accounts for multiple clients, comprising: **[[See at least column 1, lines 5-8, column 2, lines 9-13 and claims 7 and 16 of the ‘231 patent.]]**

providing a database having (i) client information for each of the a first plurality of the transaction accounts, and (ii) pooled account information associated with a single insured money market deposit account at a licensed banking institution holding funds from the first plurality of transaction accounts;

**[[Similar to the providing a database limitation in claim 1. See also at least column 2, lines 13-14 and 58-59; column 3, line 39; column 5, lines 31-42. See column 2, lines 43-47, regarding the licensed banking institution and the pooling language for the single insured deposit account. ]]**

~~administering by one or more computers clients' deposits to and withdrawals from each of their transaction accounts through a first banking institution, the administering comprising processing, by the one or more computers, client account transaction data comprised from a second plurality of the transaction accounts, the client account transaction data for a respective transaction account comprising data associated with one or more deposits and/or transfers to and/or one or more withdrawals and/or transfers from the respective transaction account during a period of time, wherein during a month period client account transaction data for at least one respective transaction account comprises at least for each of more than six (6) withdrawals and/or transfers by check and/or debit card and/or ACH debit and/or sweep within a month from each of a plurality of said respective client transaction accounts, with the transaction data comprising a respective amount for each respective withdrawal and/or transfer;~~

**[[The language in this element has been reformulated to simplify it. The element covers the processing of all of the transaction data for a period of time. The use of the term “second plurality” means that all of the transaction data for this period of time was for a second plurality of transaction accounts. See column 3, lines 23-37 and 43-63 of the ‘231 patent. The basis for adding a “sweep” may be found at least at column 3, line 27. For the processing operation, see at least column 2, lines 30-31; column 3, lines 9-11, 38-67. The performance of this processing operation by one or more computers has been added. For basis in the specification for the computer operation, see at least column 2, line 51 – column 3, lines 1-9 in applicants’ specification, and see also claims 4 and 7 of the patent. The computer operation of processing more than 6 withdrawals from each of a plurality of client transaction accounts has been added. For basis for the more than 6 withdrawals processing, see at least column 1, lines 35-63, column 2, lines 1-8, column 3, lines 13-18, 23-28 and 38-63, column 2, lines 1-8 and Fig. 1 of applicants’ ‘231 patent specification. For the change in the language to “the client account transaction data for a respective transaction account comprising data associated with one or more deposits and/or transfers to and/or one or more withdrawals and/or transfers from the respective transaction account during a period of time, wherein during a month period client account transaction data for at least one respective transaction account comprises at least**

*more than six (6) withdrawals and/or transfers by check and/or debit card and/or ACH debit and/or sweep from said respective transaction account,” see at least column 3, lines 21-23 and 45-53; the language recognizes that the data for the client transactions may be for individual transactions or nets or sweeps or ACH transfers. See column 3, lines 26-28 and 43-63.]]*

determining, by the one or more computers, a net transaction aggregated across all said of said transaction data associated with at least the second plurality of the transaction accounts for the period of time, ~~transaction account deposits and transaction account withdrawals on a regular periodic basis, with each net transaction comprising a sum determined from the data of a plurality of clients’ deposits and/or transfers to and/or withdrawals and/or transfers from a plurality of said respective client transaction accounts of a plurality of the clients where more than six (6) of the net transactions determined over the month period are negative;~~

[[As stated previously, the added limitation of withdrawing and/or transferring from the single insured money market deposit account “more than six (6)” times during a month period, can be found at least at column 1, lines 41-53 and column 2, lines 1-8. See the transaction determining limitation as in claim 1. For basis in the specification for performance of the step by one or more computers, see at least column 2, line 51 – column 3, line 9, and column 4, lines 17-20 in applicants’ specification. For basis for the additional language regarding the “net transaction data aggregated across all of said transaction data associated with at least the second plurality of transaction accounts,” see at least at column 3, lines 13-67 and column 4, lines 17-20 of applicants’ patent specification and the issued ‘231 claim 1, the “determining” element, and issued ‘231 claim 16, elements d and e. Note that the term “*determining*” is to take its ordinary meaning to one of ordinary skill in the art, as identifying or ascertaining, e.g., by looking up or retrieving from a table, a field in a database or data file, or calculating, which is the manner a computer would determine something.]]

determining, by the one or more computers, a net credit/debit amount based on at least in part ~~sending information based on the~~ respective net transaction associated with the

respective period of time, transaction which corresponds to an amount of to second banking institution holding a single insured money market deposit account to execute a funds to deposit and/or transfer to or withdraw and/or transfer a withdrawal from the single insured money market deposit account at the licensed banking institution through a different bank, so that during the month period there are more than six (6) net credit/debit amounts that are negative and correspond to withdrawals and/or transfers from the single insured money market deposit account;

**[[The basis for the claim element may be found at least at column 4, lines 29-41 of applicants' '231 patent specification. As stated previously, the added limitation of withdrawing "more than six (6)" times during a month, can be found at least at column 1, lines 41-53 and column 2, lines 1-8. The operation via a first banking institution has been changed to a "different bank." Regarding the "different bank," it is stated that in one embodiment the administrator that performs the various functions of the process is a "bank." See column 2, lines 36-43. The administrator bank is different from the deposit bank 145 holding the insured and interest bearing aggregated account, and discussed at least at column 3, lines 9-10, column 4, lines 29-67, and column 5, lines 15-30. Note that it is clear from applicants' specification that the administrator/different bank and the licensed banking institution holding the aggregated account are different entities. See, for example, the following quotations from the specification:**

The present system will be described with reference to an administrator, which can be brokerage, a bank, or another entity with which clients can institute financial transactions such as deposits and demand payments. **(Column 2, lines 36-38)**

FIGS. 1 and 2 show flowchart depicting certain processing steps the system follows at the administrator's end. **(Column 3, lines 9-10)**

The net account activity determination 135 is then used to determine a net credit/debit 139 for the single deposit account held at the bank that contains all of the funds of all of the administrator's clients; . . . **(Column 4, lines 29-32)**



See also the fund transfer operation between the administrator and the bank 145, showing that the administrator operation is separate from the bank 145. Note that while the support that the administrator can be a bank is shown, the claim does not intend to limit the administrator to being "the different bank"

The information from the calculations of a net credit/debit 139 are used to implement the processing of the actual deposit or withdrawal (141, 143) to the deposit account, and that information (and funds, if required) is sent to the bank 145 to execute the actual deposit or withdrawal required.  
**(Column 4, lines 55-59)**

The payment transfer between the bank 145 and the administrator again shows that the administrator is not the bank holding the single insured deposit account.

The bank pays interest 149 on the single deposit account to the administrator. **(column 5, lines 15-16)** [[This shows that the administrator is not the bank 145.]]

The administrator may allow a client with an account under the present system to access his funds by check or with a debit card; in such a case, the administrator has arranged for these services and maintains these relationships which are separate and apart from the deposit account. Banks that provide check and card services will transmit a file each day to the administrator that contains the checks presented for payment and/or the debit card transactions. The transactions that apply to his account under the present system are out sorted and processed against the administrator's database. The administrator will settle with each bank for the transactions that were processed. **(Column 5, lines 52-63) ]]**

~~depositing funds to or withdrawing funds from the single insured money market deposit account at the second banking institution based on the information on the net transaction, with the withdrawing funds comprising withdrawing funds from the single insured money market deposit account at the second banking institution more than six (6) times during a month and transferring the funds to the first banking institution;~~

**[[Note that this element is deleted to take into account an embodiment where the claim is from the administrator's point of view. See at least column 2, lines 36-37. The actual depositing or withdrawing may be performed, in this embodiment, not by the administrator, but by another entity. See at least column 4, lines 55-59.]]**

obtaining data, at the one or more computers, for an amount of interest earned in from the licensed second-banking institution on funds held in said single insured money market deposit account;

**[[The data is obtained at the computers of the administrator, per Figs. 1 and 2 and column 3, lines 10-11. See column 5, lines 15-22 of the '231 patent regarding the interest limitation. The "licensed banking institution" comprises the bank holding the single insured money market deposit account, referenced in Fig. 2 as bank 145 and discussed at least at column 2, lines 43-45; column 4, lines 29-67; and column 5, lines 15-30. The limitation was changed to an "obtaining" step in place of a receiving step, to encompass both the situation where data on the interest amount and the interest are received, and also the situation where only the data for the interest amount is received and the actual interest funds are provided via a direct or an indirect route, and also the situation where the interest is calculated.]]**

~~determining~~obtaining data, at via the one or more computers, for each of a respective third plurality of the transaction accounts, for a respective amount of interest to be credited to ~~owed to each of the respective client transaction account accounts as a function of a total amount of funds from the interest earned client transaction account held in the single insured money market deposit account at the~~ licensed second-banking institution;

**[[For basis for the obtaining operation, see at least column 5, lines 15-30 of applicants' patent specification. For basis in the specification for the computer operation, see at least column 2, line 51 – column 3, lines 1-9 in applicants' specification, and see also claims 4 and 7 of the patent. ]]**

distributing by crediting the client transaction accounts, using the one or more computers, the interest from said single insured money market deposit account to said client transaction accounts based at least in part on the respective amounts of interest obtained ~~determined~~ for the respective client transaction accounts; and

**[[The addition of the word “interest” clarifies an antecedence question. See column 5, lines 16-24 and 31-36. See at least the “distributing” limitation in claim 1 and column 5, lines 18-29 of the ‘231 patent and the “crediting or debiting” language at column 5, lines 31-33. For basis in the specification for the computer operation, see at least column 2, line 51 – column 3, lines 1-9 in applicants’ specification, and see also claims 4 and 7 of the patent. ]]**

updating, by the one or more computers, the client information and the pooled account information in the database-based on the clients' deposits to and withdrawals from each of their transaction accounts.

**[[See at least the “updating” step in claim 1 and column 5, lines 31-42 of the ‘231 patent. The reference to the interest updating has been deleted, as it is now encompassed by the “distributing” step. See column 5, lines 31-33. For basis in the specification for the computer operation, see at least column 2, line 51 – column 3, lines 1-9 in applicants’ specification, and see also claims 4 and 7 of the patent.]]**

33. ( New) The method of claim 32, wherein client transaction account data comprises withdrawal data associated with one or more withdrawals ~~are made~~ by at least one method selected from the group consisting of drafts (checks), credit card, debit card, sweeps, electronic transfer, and combinations thereof. **[[See at least claim 2 of the ‘231 patent. See also column 3, lines 26-31.]]**

34. ( New) The method of claim 32, wherein client transaction account data comprises deposit data associated with one or more deposits ~~are made~~ by at least one method selected from the group consisting of drafts (checks), sweeps, electronic transfers, and combinations thereof. **[[See at least claim 3 of the ‘231 patent. See also column 3, lines 13-17.]]**

35. ( New) The method of claim 32, further comprising authorizing or rejecting the use of funds in a particular client's transaction account for each demand payment requested from that client's transaction account. **[[See at least the “authorizing or rejecting” step in claim 1 of the ‘231 patent and FIG. 1, step 125, 129, 131, and Col. 4, lines 1-17.]]**

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36. ( New) The method of Claim 32, wherein one or more of the transfers and/or withdrawals from said single insured money market deposit account are requested in person. **[[See at least column 1, lines 53-58 of the '231 patent.]]**

37. ( New) The method of Claim 32, wherein one or more of the transfers and/or withdrawals from said single insured money market deposit account are requested by mail. **[[See at least column 1, lines 53-58 of the '231 patent.]]**

38. ( New) The method of Claim 32, wherein one or more of the transfers and/or withdrawals from said single insured money market deposit account are requested by messenger. **[[See at least column 1, lines 53-58 of the '231 patent.]]**

39. ( New) The method of Claim 32, wherein one or more of the transfers and/or withdrawals from said single insured money market deposit account are requested by telephone and distributed by mail. **[[See at least column 1, lines 53-58 of the '231 patent.]]**

40. ( New) The method of Claim 32, wherein one or more of the transfers and/or withdrawals from said single insured money market deposit account are requested by automated teller machine. **[[See at least column 1, lines 53-58 of the '231 patent.]]**

Cancel Claims 41-82

83. (New) The method of claim 32, wherein for the step of determining a net transaction ~~is made~~ by aggregating across all transaction account deposits and withdrawals, wherein one or more of the withdrawals are made by at least a debit card. **[[See at least the Abstract, column 1, line 37, column 2, line 49, column 3, lines 26-27, and claims 2, 5, 8.]]**

Cancel Claims 84-88

89. (New) The method of claim 32, further comprising:

determining for each of the respective third plurality of the transaction accounts, via the one or more computers, a respective amount of interest owed to the respective transaction account as a function of a respective total amount of funds from the respective transaction account held in the single insured money market deposit account at the licensed banking institution. **[[For basis for the determining operation, see at least column 5, lines 15-30 of applicants' patent specification. For basis in the specification for the computer operation, see at least column 2, line 51 – column 3, lines 1-9 in applicants' specification, and see also claims 4 and 7 of the patent. Note that the term “*determining*” is to take its ordinary meaning to one of ordinary skill in the art, as identifying or ascertaining, e.g., by looking up or retrieving from a table, a field in a database or data file, or calculating, which is the manner a computer would determine something.]]**

90. (New) The method of claim 32, wherein the second plurality is equal to the first plurality. **[[Note that the “*second plurality*” represents the transaction accounts with client account transaction data for a respective period of time. In most cases, it is unlikely that all account in the first plurality of transaction accounts will have client account transaction account in a given period of time, e.g., a day. See column 3, lines 23-37 and 49-63 of the '231 patent. However, this claim covers the possibility where account transaction data is received from every transaction account in the first plurality.]]**

91. (New) The method of claim 32, wherein the third plurality is equal to the first plurality. **[[Note that the “*third plurality*” represents the number of transaction accounts for which a respective amount of interest is obtained to be credited to the respective transaction account from the interest earned in the single insured money market deposit account at the licensed banking institution. This claim covers the**

**situation where every transaction account in the first plurality of transaction accounts has a respective amount of interest obtained.]]**

**LITIGATION UPDATE:**

While the '231 Patent is not presently the subject of any litigation, six patents which claim priority to the same application as the '231 Patent, continue to be the subject of a litigation between Applicant (and its related entities) and Deutsch Bank Trust Companies of Americas and Total Bank Solutions, LLC, as previously advised. Fact discovery was completed in the litigation and expert discovery will be completed by the end of January 2011. Information regarding assertions made in that litigation to the extent not subject to a Protective Order has been submitted in information disclosure statements.

Assertions made against other defendants were previously resolved, as reflected in information disclosure statements previously filed.

**UPDATED SUPPLEMENTAL DECLARATION:**

**An updated Supplemental Declaration signed by the inventors is attached that includes an error listing with a specific references to the claims and claim limitations. Accordingly, it is requested that the rejection be reconsidered and withdrawn.**

The examiner should be aware that the following co-pending patent applications disclosed in an IDS relate to similar kinds of products, although the claims are clearly patentably distinct. The most recent action for these applications is listed.

10/825,440 filed 04-14-04 (03/02/10 Office Action rejection—response filed)  
09/677,535 filed 10-02-00 (Issued as U.S. Patent No. 7,752,129)  
10/071,053 filed 02-08-02 (Issued as U.S. Patent No. 7,519,551)  
10/305,439 filed 11-26-02 (Issued as U.S. Patent No. 7,680,734)  
11/149,278 filed 06-10-05 (Issued as U.S. Patent No. 7,672,886)  
10/382,946 filed 03-06-03 (Issued as U.S. Patent No. 7,536,350)  
10/411,650 filed 04-11-03 (Issued as U.S. Patent No. 7,509,286)

11/641,046 filed 12-19-06 (Office Action—Response filed)  
11/689,247 filed 03-21-07 (Issued as U.S. Patent No. 7,752,107)  
11/767,827 filed 06-25-07 (Issued as U.S. Patent No. 7,668,771)  
11/767,837 filed 06-25-07 (Issued as U.S. Patent No. 7,680,716)  
11/767,846 filed 06-26-07 (Issued as U.S. Patent No. 7,672,901)  
11/767,856 filed 06-25-07 (Issued as U.S. Patent No. 7,672,902)  
11/840,064 filed 08-16-07 (10/15/08 Office Action with rejection—abandonment  
notice)  
11/840,060 filed 08-16-07 (Issued as U.S. Patent No. 7,769,688)  
11/840,052 filed 08-16-07 (Issued as U.S. Patent No. 7,809,640)  
11/932,762 filed 10-31-07 (Issued as U.S. Patent No. 7,716,131)  
12/271,705 filed 11-14-08 (Issued as U.S. Patent No. 7,668,772)  
12/025,402 filed 02-04-08  
12/385,522 filed 04-10-09 (Notice of Allowance; RCE filed)  
12/340,026 filed 12-19-08  
12/408,507 filed 03-20-09  
12/408,511 filed 03-20-09  
12/408,523 filed 03-20-09  
12/453,387 filed 05-08-09  
12/453,388 filed 05-08-09  
12/453,389 filed 05-08-09  
12/453,390 filed 05-08-09  
12/638,544 filed 12-15-09  
12/622,979 filed 11-20-09  
12/684,071 filed 01-07-10  
12/686,797 filed 01-13-10  
12/794,545 filed 06-04-10  
12/794,448 filed 06-04-10  
12/816,092 filed 06-15-10  
12/829,961 filed 07-02-10  
12/953,221 filed 11-23-10

12/974,974 filed 12-21-10

The examiner is directed to review the file of these other co-pending applications as he deems appropriate, to determine the reasoning and references applied in the current and/or prior office actions, as well as applicants' responses thereto.

The present application is now in condition for allowance.


The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any deficiency or credit any over-payment to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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